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Via Electronic Mail To:

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**RE: United States v Dr. Christopher Russo
Case no. 2:18-cr-20800**

NOTICE OF EXPERT TESTIMONY

Pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C), this notice provides the Government with a summary of the expected expert testimony that the Defendant intends to offer at trial. In addition to identifying Defendant's expert, below, is a written description of the proposed expert testimony, the expert's opinion, and a description of the expert's qualifications. If additional experts are retained, Defendant will provide notice as required.

Dr. Anthony Chiodo, M.D., M.B.A.

Dr. Chiodo is a Professor and Associate Chair in the Department of Physical Medicine and Rehabilitation at the University of Michigan Health System in Ann Arbor, Michigan. He also serves as Medical Director of Spinal Cord Injury Medicine and Medical Director of the Spine Program. His academic areas of interest include anatomic localization in electromyography, clinical electromyography, spinal cord injury, and spine pain. He is presently certified by the Michigan Board of Pharmacy Controlled Substance, the Federal Drug Enforcement Agency, and has held certifications in Pain Management from the American Board of Physical Medicine & Rehabilitation. He is board-certified in pain medicine and spinal cord injury medicine. Dr. Chiodo has held leadership and board positions in The American Association of Neuromuscular & Electrodiagnostic Medicine (AANEM), The American Board of Physical Medicine and Rehabilitation (ABPMR), and The American Board of Anesthesiology. He has previously testified as an expert witness and offered insight related to pain medicine and prescription, in which he draws from his vast knowledge and expertise of the specialty.

Defendant anticipates that Dr. Chiodo will testify about Dr. Russo's practices at the Pain Center: that Dr. Russo did not conduct medically unnecessary treatments, that Dr. Russo's interventional pain practices were reasonable and warranted by the identified needs

of the patient, and that Dr. Russo prescribed narcotics reasonably and well within the ordinary course of professional practices. He will testify that Dr. Russo followed the applicable standard(s) of care as a physician working for Dr. Bothra's medical practice. Dr. Chiodo will also speak about documentation and billing practices related to pain clinics, including, but not limited to, the following: MAPS reports generally, and specifically to reports for patients identified by the government as potential witnesses; the interplay and commonality of pain physicians prescribing opioids and periodic injections; Medicare billing and coding; qualitative and quantitative drug testing; the CDC guidelines and other regulations relative to any issue raised by the government, including but not limited to per diem MME, primary care and chronic/acute care, and the most recent authoritative pronouncements on the CDC's 2016 guidelines. He may also address the treatment of specific patients identified by the government in discovery and Dr. Russo's care of them. Finally, Dr. Chiodo may address the claims made by Dr. Mehta in the Government's Rule 16 disclosures.

Dr. Chiodo is uniquely qualified to offer his expertise. Beyond his professional achievements and prior experience that have been previously discussed, he has worked extensively in the field of physical medicine and rehabilitation since 1987. He has presented and spoken at various conferences around the country for the past two decades on topics such as pain management. His long list of recognized publications and research studies include distinguished journals such as the American Journal of Physical Medicine and Rehabilitation and the Archives of Physical Medicine and Rehabilitation.

Sincerely Yours,

/s/ Laurence H. Margolis

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